

THE CHRYSLER BUILDING 405 Lexington Avenue, NY, NY 10174-1299 Tel: 212.554.7800 Fax: 212.554.7700 www.mosessinger.com

December 3, 2019

FILED VIA ECF

Hon. Vernon S. Broderick United States District Judge Southern District of New York 40 Foley Square New York, New York 10007 The plea hearing scheduled for December 6, 2019, 2019 is hereby adjourned to January 10, 2020 at 12:00 p.m. The adjournment is necessary to permit the parties time to continue discussing a pretrial disposition of this matter. The Court finds that the ends of justice served by granting a continuance outweigh the best interests of the public and the defendant in a speedy trial. Accordingly, it is further ordered that the time between December 6, 2019 and January 10, 2020 is hereby excluded under the Speedy Trial Act, 18 U.S.C. 3161 (h)(7)(A), in the interest of justice.

So Ordered

Re: <u>United States v. Brandon Martin and Tameko Lindo</u> Docket No. 19 Cr. 00240

Dear Judge Broderick:

Vernon S. Broderick 12/5/2019 United States District Judge

On behalf of Brandon Martin and Tameko Lindo, we would respectfully request that the plea hearing presently scheduled for December 6th, 2019 be rescheduled for either January 10th, 17th, 2020, or to a date within that 1-week time period convenient to the Court. I have left a message for AUSA Kyle Wirshba that I would be making this request.

I make this request due personal health issues, relative to which I am scheduled for surgery next week.

I would also waive speedy trial time through the adjourn date on behalf of Ms. Lindo and Mr. Martin as we are engaged in finalizing plea negotiations, and in the interests of justice.

Accordingly we would most respectfully request that Friday's appearance be rescheduled as requested above.

The Courts consideration is greatly appreciated.

Respectfully,

Barry Zone

Attorney for Defendants Brandon Martin and Tameko Lindo

AUSA Kyle A. Wirshba AUSA Tara M. La Morte